

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WASHTENAW COUNTY EMPLOYEES'
RETIREMENT SYSTEM, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

WALGREEN CO. et al.,

Defendants.

Civil Action No. 1:15-cv-3187

Honorable Sharon Johnson Coleman

**CLASS REPRESENTATIVE'S UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED SETTLEMENT AND AUTHORIZATION TO
DISSEMINATE NOTICE OF SETTLEMENT**

Court-appointed Class Representative Industriens Pensionsforsikring A/S, by and through its undersigned counsel, respectfully moves this Court for entry of an Order: (i) granting preliminary approval of the proposed class action settlement of the above-captioned action on the terms set forth in the Stipulation and Agreement of Settlement dated June 23, 2022 ("Stipulation" or "Settlement");¹ (ii) approving the form and manner of providing notice of the Settlement to Class Members; (iii) denying a second exclusion opportunity for Class Members; and (iv) setting a hearing date for final approval of the Settlement no earlier than 100 days from the filing of this Motion and the Settlement with the Court, *see* 28 U.S.C. § 1715(d); as well as a schedule for various events and deadlines in connection with the Settlement.

This Motion is based upon the Stipulation, the accompanying Memorandum of Law; and all other papers and proceedings herein. The [Proposed] Order Preliminarily Approving Settlement and Providing for Notice is attached as Exhibit A to the Stipulation.

Pursuant to the terms of the Stipulation, this Motion is unopposed by Defendants.

¹ Capitalized terms not defined herein have the meanings ascribed to them in the Stipulation.

Dated: June 23, 2022

Respectfully submitted,

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